



NEW JERSEY OFFICE
6 POMPTON AVENUE, SUITE 25
CEDAR GROVE, NJ 07009
(973) 239-4300

NEW YORK OFFICE
347 5TH AVENUE, SUITE 1402
NEW YORK, NY 10016
(646) 205-2259

LORRAINE@LGRLLAWGROUP.COM
WWW.LGAULIRUFO.COM
FAX: (973) 239-4310

MEMO ENDORSED

February 28, 2023

Via ECF
Hon. Edgardo Ramos
District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

A bond hearing will be held on March 6, 2023 at 11 a.m.
SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 3/1/2023

New York, New York

Re: United States v. Michael Thomas
23-cr-038 (ER)

Dear Judge Ramos:

I represent Michael Thomas in the above matter. We have a sufficient bail package and would appreciate an opportunity to be heard. Therefore, we are respectfully requesting that Your Honor schedule a bail hearing on either March 3, 2023, March 6, 2023 or March 10, 2023, should Your Honor be available on one of these dates. The Government is available for a bail hearing on these dates. The Government is opposing bail in this case. Your Honor's time and consideration of this request is extremely appreciated. We respectfully request a bail hearing scheduled at Your Honor's earliest convenience.

Respectfully submitted,
s/ Lorraine Gauli-Rufo
Lorraine Gauli-Rufo
Attorney for Michael Thomas

cc: Thomas Burnett, AUSA